

From: [Jennifer Williams](#)
To: [Evita Tolu](#)
Subject: Re: Request for complete file for Sara Haynes and Mikaela Haynes
Date: Tuesday, June 1, 2021 4:26:43 PM

Ms. Tolu,

GAL Standard 7.0 indicates that a GAL's file belongs to the court. If the court directs me to turn my file over, I will comply with any order if I am so directed.

Sincerely,

Jennifer

On Mon, May 31, 2021 at 2:59 PM Evita Tolu <evitatolu@outlook.com> wrote:

Ms. Williams,

I recently entered my appearance in the case Haynes v. Haynes, 13RI-CV00544, to represent Cynthia Haynes. From review of the docket entries, it appears that you served as a GAL, attorney, and a party in this case from January 2017 until April 29, 2021.

I currently also represent the estate of Mikaela Haynes and the interests of Mrs. Haynes' living child Sara Haynes as it pertains to all divorce matters, property entitlements, previously concluded juvenile matters and any and all future legal matters involving your former clients, Mikaela, and Sara Haynes.

In order to provide adequate and zealous representation to the estate of Mikaela Haynes and to Sara Haynes, I am requesting that you provide me with a complete, unredacted, and unaltered legal files of all Mikaela and Sara's documents you received from anyone involved in their lives including but not limited to Charles Haynes, Bernice Haynes, Karen Haynes, Ted Liszewski, Siegrid, Randolph and Matt Maness, Samantha Dawn Pennington Evans, Kerri Smith, Sara Marler, Ramona Gau, any and all attorneys at Kennedy, Kennedy, Robbins & Yarbrow, L.C, any and all Judges you communicated on behalf of Mikaela and Sara and who communicated with you, any and all juvenile officers and professionals involved with Sara and Mikaela, their foster parents and all medical professionals involved, that you contacted or who contacted you in the course of your representation of Mikaela and Sara, any and all documents you received, reviewed, analyzed, generated, created, copied, stored, prepared, filed, submitted in acting as Sara and Mikaela's GAL, their personal lawyer and the party to Haynes v. Haynes. I am also seeking any and all documents you prepared, generated, accumulated, used for any purpose and in any form, including but not limited to paper, video, audio, ESI digital files in their native formats as required by **Rule 4:16 of the MRPR:**

(d) Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred. The lawyer may retain papers relating to the client to the extent permitted by other law. See, *Rule 4-1.16(d) - Client-Lawyer Relationship - Declining or Terminating Representation*, Mo. R. Gov. Bar Jud. 4-1.16.

Basically, as Sara's and Mikaela's successor attorney, I am asking you to provide me with every single record in any form or format that you have pertaining to your former clients,

Sara and Mikaela. In addition, please provide me with a complete accounting of all the bills, statements, and payments you received from any parties involved in Mikaela and Sara's matters to which you were a privy in your capacity as their GAL, as their personal attorney and as a party to the case Haynes v. Haynes 13RI-CV00544, and any other pending and non-pending matters that you attended in those capacities. This request is made pursuant to **Rule 4-1.16(d)** and **Rule 4-1.22** of the MRPR. I am requesting copies of all these documents as soon as possible so I can continue representing Mikaela's estate and Sara without interrupting the required services. I am requesting you in writing to preserve all your records generated during your involvement beyond the required 6-year retention period because of Sara being a minor as allowed by Rule 4-1.22. **As Sara's current attorney and the attorney for the estate of Mikaela Haynes I am asking you to preserve and retain all the documents and refrain from destruction of any documents until Sara turns 18 and is able to make the decision with respect to her records on her own. I am also asking you not to destroy and to protect any and all records pertaining to Mikaela even after the required 6-year retention period expires until you are provided with further notice.**

Time is of the essence. Please provide the requested documents by **June 7, 2021 5:00 pm** so that your clients continue receiving benefits from the legal services they need. If there is a delay in producing these documents by June 7, 2021, please contact me immediately to discuss how we can resolve the delay efficiently and timely. Having served Sara and Mikaela for three years, you understand my concerns regarding interruption of services. Interruption of services will result in jeopardizing your and my clients' interests which I believe you would want to protect.

Thank you for your help with this matter. Please contact me with any concerns or questions. If you need to ship me the records, please let me know and I will provide you with the secure mailbox address. You can also drop box them, use cloud, zip folders, and google docs.

Evita Tolu

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License in California, Illinois & Missouri

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--

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